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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

9 KCG AMERICAS LLC, a Delaware  
10 limited liability company, and KCG  
11 HOLDINGS, INC., a Delaware  
12 corporation,

13 Plaintiffs,

14 v.

15 ZHENGQUAN ZHANG, an  
16 individual,

17 Defendant.

Case No. 5:17-cv-1953

[*Hon. Edward J. Davila*]

**NOTICE OF MOTION AND  
MOTION TO WITHDRAW AS  
ATTORNEY OF RECORD FOR  
ZHENGQUAN ZHANG**

**NOTICE OF MOTION PERMITTING WITHDRAWAL OF COUNSEL**

To the Clerk of this Court and all parties and their counsel of record:

PLEASE TAKE NOTICE that Ronald Gainor, *Pro Hac Vice* counsel of record and Adam Pennella, local counsel (collectively "Counsel"), upon this Motion and Declaration, seek to withdraw as counsel of record for Defendant Zhengquan Zhang, and hereby move this Court for an order permitting them to withdraw.

**MOTION FOR ORDER PERMITTING WITHDRAWAL OF COUNSEL**

Pursuant to Rule 3-700 of the California Rules of Professional Conduct and Civil Local Rule 11-5, Counsel seek to be relieved as counsel in the instant litigation. Mr. Gainor currently serves as *Pro Hac Vice* counsel for Defendant and Mr. Pennella as local counsel; both seek to withdraw as counsel.

A Complaint was served on the Defendant on April 7, 2017 seeking, among other things, a permanent injunction against the Defendant. Pursuant to this Court's Order dated August 11, 2017 [D.E. 27], this matter was stayed pending the resolution of a related criminal action, *United States of America v. Zhengquan Zheng*, Crim. Action No. 17-cr-560-JMF, United States District Court, Southern District of New York. The criminal matter is still pending.

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 WHEREFORE, Counsel hereby request an order authorizing the withdrawal as  
13 counsel for Mr. Zhang in this matter, [REDACTED]  
14 [REDACTED] and to be removed from Electronic Case Filing System.  
15

16 Respectfully submitted,

17 s/ Ronald Gainor

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25 s/ Adam Pennella

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*Local Counsel*

Attorneys for Defendant  
Zhengquan Zhang

**DECLARATION OF RONALD GAINOR**

RONALD GAINOR, hereby declares the following to be true:

1. I am a member of the law firm of Gainor & Donner, attorneys for Zhengquan Zhang, the defendant in the above-captioned matter.

2. I make this declaration in support of the Motion to Withdraw as Counsel.

3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746(2), that the foregoing is true and correct.

Executed this 4th day of May, 2018 in Miami, Florida.

s/ Ronald Gainor  
Ronald Gainor, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of May, 2018, I filed the foregoing **Notice, Motion and Declaration** with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 4, 2018.

s/ Ronald Gainor  
Ronald Gainor, Esq.